

way of further response, Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and it is therefore denied. Without waiving the foregoing and by way of further response still, upon information and belief, Debtor has not submitted an application for a loan modification to Creditor nor has Debtor otherwise applied for assistance from the Homeowner Assistance Fund (“HAF”) or any other assistance. Debtor previously applied in 2019 and was denied. Accordingly, this averment is denied.

5. (Paragraph 19) Denied. The averments contained in this paragraph constitute conclusions of law to which no response is required, and they are therefore denied.
6. (Paragraph 20). Denied. The averments contained in this paragraph constitute conclusions of law to which no response is required, and they are therefore denied.
7. (Paragraph 21) Denied. The averments contained in this paragraph constitute conclusions of law to which no response is required, and they are therefore denied.
8. Paragraph 22) Denied. The averments contained in this paragraph constitute conclusions of law to which no response is required, and they are therefore denied.

WHEREFORE, Movant prays that upon final hearing of this Motion, the automatic stay pursuant to 11 U.S.C. Sections 362(d)(1) and 1301 be modified to permit Movant to exercise its rights pursuant to the Mortgage and Note and applicable state law with regard to the Real Property; that upon entry of an Order Granting Relief Movant will no longer be required to file and serve the Notice of Payment Change and or Notices of Post-Petition Fees, Expenses and Charges as required by FRBP 3002.1(b) and FRBP 3002.1(c); that Rule 4001(a)(3) be waived; and requests that the relief granted by this motion survive the conversion of this case to a case under any other Chapter of the Bankruptcy Code and that it have such other and further relief as is just.

VAUGHAN MCLEAN

By: /s/ M. Jacqueline Larkin
M. Jacqueline Larkin, Esq.
ID No. 30919
Two Logan Square
100 N. 18th Street, Suite 700
Philadelphia, PA 19103
(215) 569-2400

Date: June 4, 2024.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	
MARIE C. MAGERA MBUI	:	CASE NO. 23-12191-AMC
	:	
	:	
CITADEL FEDERAL CREDIT UNION	:	CHAPTER 13
	:	
MOVANT,	:	11 U.S.C. § 362
	:	
	:	
v.	:	
	:	
MARIE C. MAGERA MBUI	:	June 5, 2024, 10:00 A.M.
DEBTOR,	:	Courtroom # 4
	:	
SCOTT F. WATERMAN, TRUSTEE	:	
ADDITIONAL RESPONDENT	:	

CERTIFICATION OF SERVICE

I, M. Jacqueline Larkin, Esquire, hereby certify that I did cause a true and correct copy of the foregoing Reply to be served on this 4th day of June 2024 via the CM/ECF System of the Court upon the following individuals and first-class mail:

Roger V. Ashodian, Esquire
Regional Bankruptcy Center of SE PA
101 West Chester Pike
Suite 1 A
Havertown, PA 19083
Email: ecf@schollashodian.com

Marie C. Magera Mbui
1018 Riverwalk Drive
Phoenixville, PA 19460

Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
ECFMail@ReadingCh13.com

United States Trustee
900 Market Street
Suite 320
Philadelphia, PA 19107

VAUGHAN MCLEAN

By: /s/ M. Jacqueline Larkin
M. Jacqueline Larkin, Esq.
Attorney ID No. 309190
Two Logan Square
100 N. 18th Street, Suite 700

Philadelphia, PA 19103
(215) 569-2400